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To

Subject Plainwell TCRA proposed change to bank stabilization approach

Mike:

As you made us aware of on March 11, and as we have discussed recently, erosion has been observed along the banks of the Kalamazoo River in Removal Areas 6B and 7B. The removal activities in these areas were completed last year, and top soil had been placed prior to the end of construction activities in 2007. The full vegetation-based stabilization components of the project had not yet been put in place in this area due to the time of year when the work was completed.

It appears from observation of the areas that the removal of the mid-channel islands in this part of the river, combined with the high flows that were experienced in February, led to higher-than-anticipated stress being placed on the bank in this area. This is an area where the river channel narrows dramatically, and we believe it is reasonable to anticipate that similar forces could be imparted to the bank, resulting in further erosion and potential instability. We believe this is the possible even if the fully revegetated bank were in place prior to the next high flow event.

Therefore, we are proposing to place river run rock over a limited portion of the area, in a similar fashion to what was placed directly across the river in Removal Area 6A. The attached figure shows the location of the proposed rock placement, and also provides a plan view of the area where the subject erosion has taken place. One note, the utility pole shown on the figure will be relocated landward by Consumer's Energy.

Please consider this request and upon your approval we will schedule the implementation of the stabilization measures. We are available to answer any questions you may have about this request. Thanks.

*Steve*

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